

Exhibit G

Theresa Malone

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
: SS.:
COUNTY OF NASSAU)

THERESA MALONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 621 East Beech Street, Long Beach, NY 11561.
2. My current age is 56, having been born on January 27, 1966.
3. I am the daughter of John Bohlmann, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from metastatic mesothelioma on October 29, 2017. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.
5. My dad and I were very close. I spoke to him every day, and I would see him whenever possible. I'm in New York, and my parents were in Maryland. I would visit them, and vice versa. He loved to come to Manhattan, and we would walk on the High Line together. We loved to explore and travel together. We had all sorts of big plans for traveling. We had a close father-daughter relationship.

6. I know that my father was working in lower Manhattan after 9/11/2001. We were in touch that day. He worked near the World Trade Center. He was a supervisor for Local 12, the International Association of Heat and Frost Insulators. He worked at Ground Zero nearly every day, helping to rebuild and clean up. He worked there for eighteen months while the pile was being cleared, supervising the staff on the job. My dad also worked alongside my younger brother Johnny.

7. For at least two years, I noticed that my dad had started to develop a nagging cough. He began to experience pain behind his shoulder. His energy level was decreasing, and he was always tired. Over time, noticeable signs like these began to emerge. My dad would call me every day, but the phone calls became shorter and shorter, as he couldn't speak for as long. My parents kept my father's medical problems to themselves, because they didn't want us to worry about what was going on. But I remember my mom calling me once when my dad visited, and saying, "Keep an eye on your father, and tell me if you notice anything different." We slowly started to notice changes in him. I made trips from New York to Maryland to check in on him and spend time with him. When my father began to get more ill, I tried to be there as much as I could for him and my mother. It was a very difficult time.

8. The doctors found asbestos in his lungs following a lung biopsy in 2014. In around 2015, I learned that my dad had thyroid cancer, close to the time that he had a thyroid procedure. He had other conditions certified by the World Trade Center Health Program as well. After my father was diagnosed with lung cancer, he was in excruciating pain for months. He was going to have a portion of his lung removed in 2017. When they opened him up, they couldn't even perform the surgery. The cancer had spread everywhere. They told us he had two fatal types of mesotheliomas.

9. The news following his surgery was just devastating. It was very hard to function at work. I worked in Manhattan, and I used to call my dad on my way to work every day. I found myself just sitting at my desk, trying not to think about his illness. I couldn't even focus on the work I was doing. Emotionally, it was very hard. My job gave me some time off here and there. But it was hard to function socially and professionally.

10. He missed out on so much. Family holidays, travel, everything. My dad had just turned eighty, and we booked a surprise cruise for him that he wasn't able to go on. We had to cancel the family cruise for everyone. You talk to someone every day, and one day they're not

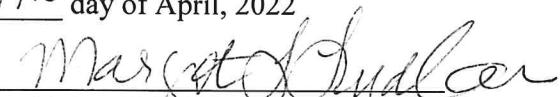
there anymore. We were so close. His illness impacted me a lot. I was in a lot of pain after his death. It affected not just me, but also my family.

11. I had all sorts of plans with my father. To pass away that early—it's a huge loss. His family had longevity. His uncle lived to 104. He would have been a very vibrant eighty-year-old. When he told people that he was almost eighty, they never believed him. I truly thought that we would have twenty-five more years together. My dad acted young, but the illness really just crushed him. He worked so hard his whole life, and he couldn't enjoy it.



THERESA MALONE

Sworn to before me this
11th day of April, 2022



Margot L. Ludlam
Notary Public

MARGOT L. LUDLAM
Notary Public, State of New York
No. 02LU6044662
Qualified in Suffolk County
Commission Expires Dec. 12, 20
April 6, 2023

Lisa Lacy

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

AFFIDAVIT OF LISA LACY

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

LISA LACY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 13 Alyssa Rose Lane, New Egypt, NJ 08533.

2. My current age is 55, having been born on February 16, 1967.

3. I am the daughter of Alfred Borowski, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on May 14, 2014. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. My father was heavily involved in my life. I'm a mother of triplets, plus another daughter. He basically lived in my house Monday through Friday, helping me take care of my children. He was a full-time, live-in grandfather. He would help my husband and me with the house and the lawn. We would have movie night, pizza night, and bagel breakfasts. He would go to all of my kids' soccer games, football games, and Boy Scouts trips. He was a huge influence for my son, who became an Eagle Scout because of his grandfather. My father was

also a marine, and my son went into the service to honor his grandfather. We went on summer vacations as a family.

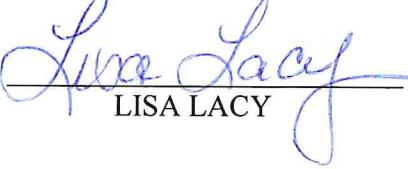
6. My dad was a night manager for Verizon, on the Operations team. He went to the World Trade Center site on the morning of 9/11/2001 and didn't come back until the early morning hours of the next day. He worked around the clock at Ground Zero until the end of November 2001. He said it was absolutely horrific. He traveled across the rubble on a four-wheeler, because the debris was too hot to walk on. He saw limbs, pictures, and wedding rings lying in the wreckage. He watched cadaver dogs sniff out bodies. Within a day, he said he knew there were not going to be any survivors. He was formerly a Marine and had never seen anything so bad. He told me that the smell of the bodies burning alone was horrific; it stayed with him for the rest of his life.

7. At the end of November 2001, my father began to have skin irritation. He developed lung issues and was constantly short of breath. His eyes were bloodshot from all the particles of dust flying around at Ground Zero. Within a year, his lungs weren't clearing up like they should've been and his limbs were swelling. He was seeing heart specialists and pulmonologists; it was just doctors' visits non-stop. He was seen by the World Trade Center Health Program doctors as well. It started off with minor stuff, like a chronic cold, which then would build into bronchitis and then pneumonia. In January 2014, he went to Robert Wood Johnson University Hospital for what we thought was pneumonia, but a lung fluid sample showed that he had lung cancer. I was devastated to learn that he was diagnosed with lung cancer. He passed within weeks of us finding out.

8. When his lung cancer symptoms started to progress, he was living with us full-time. We took him to doctors appointments all the time, which made him irritated. I took off work to take care of him, help him with physical therapy, and make sure he took all the right medications at the right time. He had issues retaining water in his legs, and I'd have to watch him in pain at the doctor's office getting his legs drained. You don't want to hear that someone you love tremendously is going to die. I sacrificed a lot to make sure my dad had the quality of life that he deserved when he had cancer. My triplets were young, and my youngest daughter was only two years old at the time. But I wanted to be there for my father.

9. My husband, my children and I all loved my father to pieces. It was a full-family effort, taking care of him. My father was only six months until his retirement when he started

getting sick, and it was stolen from him by the illness. He was a loving father and grandfather. He has missed out on weddings and other milestones. He brought so much to the table. He was so close to retirement and was working his whole life. I believe there should be representation for my father's name.


LISA LACY

Sworn to before me this

5 day of April, 2022 May 2022



Notary Public

MARY ELLEN HUNSICKER
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 8, 2023

Lara J. Brindisi

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

**AFFIDAVIT OF
LARA J. BRINDISI**

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
: SS.:
COUNTY OF MIDDLESEX)

LARA J. BRINDISI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1124 Schmidt Lane, North Brunswick, NJ 08902.

2. My current age is 27, having been born on October 20, 1994.

3. I am the daughter of Frank M. Brindisi, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from esophageal cancer on January 13, 2018. It was medically determined that this illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was as close with my father as he was capable of being. I would sit and talk with him. We mainly talked about things that he liked: physics theories or how things worked around the house. I was six years old when 9/11 happened, so most of my memories with him are after that. I would've been closer with him if it wasn't for his mental illness stemming from 9/11. He

didn't really talk too much at all, unless he was telling me his emotions after a fight or something. As I got older, he lost a lot of motivation to do anything.

6. I didn't really know what happened on 9/11/2001 at the time. I knew that my mom was nervous, and she said that dad was going to be home late. He came home, and I was put to bed pretty early. I only spoke with my dad about what happened when I got older. He was in the lobby of the World Trade Center and went to open the elevator. When he opened the elevator, it erupted into flames, and the lobby filled with smoke. He saw that and knew right away that something major was happening. He was one of the first people to get out of the building and that was probably one of the only reasons he survived. He walked around covered in soot before he was able to escape the city. He later told me how, if he hadn't left the building that morning to get a cup of coffee, he would've been trapped on a higher floor of the building. It haunted him that he was so close to the center of the disaster, and it haunted him that he was one of the few to make it out alive. He had survivors' guilt.

7. The father that I knew after 9/11 wasn't the same man that my mother had married at all. He was easily angered from the PTSD. I walked on eggshells around him, and I didn't want to say anything to trigger him. It was harder for my mother and brother than it was for me, because they knew my father better before his emotional and mental change. I couldn't really talk to my father about any problems in my life. He was so consumed by his own emotions that he didn't understand others. He would be there to help me in an emergency, but he never extended any emotional support to me. He would tell me he had no reason to live. He was trying to go to therapy, but oftentimes it didn't work. I'm not a therapist, but I could tell that he was depressed. He was not motivated to do anything. It really limited our ability to have a relationship like I would've wanted with a father.

8. Years later, I came to learn of my dad's esophageal cancer. I was traveling internationally when my parents learned of it, and they told me when I came home. I was completely shocked that he had cancer. It was weird because the only problem he previously had was trouble swallowing and a cough. His cancer progressed extremely quickly, and no one saw it coming. That's what happens when cancer is caused by an environmental condition. Within a few months following his diagnosis, his cancer was in Stage IV, and it was metastasizing.

9. I was a senior in college and moved back home when my dad was diagnosed with cancer. I wasn't really planning on moving back in with my parents. I was independent from the time I turned eighteen, and I had never spent more than two weeks at a time at home after that. But I moved home to give my mom emotional support. My mom mostly handled my dad's care. I also helped with my father's care, bringing him to doctor's appointments and helping convey doctor's instructions to my mom. I had a degree in biology, so I felt like I understood what the doctors were saying.

10. My father's cancer was horrible. Brutal. I never imagined how bad it could get. We watched him go from a healthy person to a skeleton. When we see the very last pictures of him, it looks nothing like him. You could see his whole skull and every bone in his body. He was a strong man who became completely frail. The tumor in his arm was like a baseball, and he could hardly lift his arm. He was a proud man. It was hard for him to show us that he couldn't even walk or lift his arms. He couldn't do anything anymore. We tried to put him in experimental trials and all these treatments, but there was no shot at his survival.

11. It's hard to talk about losing my father, because I felt like I never even had him. 9/11 happened when I was so young. I saw pictures of our family before 9/11. My dad loved to take pictures of us. Sometimes, he wasn't in the pictures, and sometimes he was. After 9/11, he didn't take pictures of happy moments anymore. We went from being a nice, happy family with many pictures to no pictures at all. A mood had changed in all of us.

12. Toward the end of my father's life, we put him in a nursing home. It was a horrible experience, and the nursing home tried to extort my mother for money. It was horrible for her to go through all of that. When my dad was home, he needed constant attention. Everyone had extra jobs to pay the bills, and we were wildly in debt from years of my dad's unemployment. His illness changed all of our lives. My brother Tom was trying to get his life together, and I was planning on finishing college or studying abroad. All of that was put on hold.

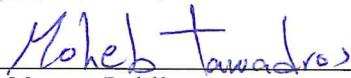
13. The illness my father experienced was terrible. He was in so much pain all the time. The depression and PTSD he had experienced made him consider suicide, but he had never committed self-harm. When he was actually faced with death, he didn't want to die. He took every treatment he could to stay alive. He wanted to see more life. But now he wanted to

be alive, and he didn't have the choice.



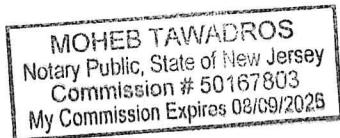
LARA J. BRINDISI

Sworn to before me this
13 day of April, 2022



Moheb Tawadros

Notary Public



Shari G. Brindisi

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF
SHARI G. BRINDISI**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
: SS.:
COUNTY OF MIDDLESEX)

SHARI G. BRINDISI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1C Chadwick Lane, Monroe NJ 08831.

2. My current age is 64, having been born on October 24, 1957.

3. I am the wife of Frank M. Brindisi, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband died from esophageal cancer on January 13, 2018. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. Before 9/11, Frank and I had a happy family life. We raised two kids together and did normal things. We watched movies, visited friends, visited family, and engaged in activities with our kids. We had a normal, peaceful life. Everything was good.

6. Frank worked for Blue Cross Blue Shield in the World Trade Center. He was in the lobby of the World Trade Center on the morning of 9/11. He went to open an elevator, and the lobby filled with fire and thick, black smoke. He felt his way out and ran into an overpass,

where he saw the towers coming down and people jumping from the towers. He was taken to a local hospital to rinse his eyes and get the dust off him. He roamed the streets until late at night because he wasn't able to get out of Manhattan. Finally, I got in touch with him at 11:00 pm. I picked him up late at night. He was shocked.

7. His whole personality changed after 9/11. He became very introverted, withdrawn, negative, and angry. He was like a recluse, and he stayed in one room all the time. He would always say that 9/11 didn't affect him, but we knew it did. He never really spoke about it. Frank became an abusive husband. He would yell in the streets and in our home. He didn't want to do anything anymore. He had suicidal thoughts. We saw psychologists and social workers and none of them really worked. We had one person who worked for a while, but then they left their job. So, we really never found anyone good for him.

8. Life became very difficult financially. After 9/11, he was out of work for some time. He had a hard time finding a new job, especially because a lot of the job opportunities for his line of work were being sent overseas. He finally took a job that paid a third of what he previously made. I forced him to take it just to have a job and to have some sanity and structure in his life. It was a hard time, and we had no money. Our lives completely changed. There were no more vacations, just work. We had a mortgage to pay, and even money for food was hard to find at the time. We maxed out our credit cards and ended up with thousands of dollars of credit card debt. We were all very anxious.

9. Right before Thanksgiving of 2016, Frank was having a hard time swallowing. He had mentioned before that he was often feeling cold. Otherwise, nothing was out of the ordinary. We took him to the doctor, where they found a mass in his esophagus. The cancer had already spread to his bones at that time. He had multiple nodes across his body, and the doctors weren't sure which ones were going to become cancerous. He had hip pain and had a hip surgery. But other than that, they couldn't do anything to remove the tumors except for chemotherapy and radiation. They tried chemo after chemo.

10. It was a horrible time. I was working full-time, I had two kids to take care of and bills to pay. It was a nightmare. I had to take Frank back and forth to chemotherapy and do whatever I had to do. It was a very hard time. I couldn't take time off work to take care of him, because otherwise we would have no income. I would have to leave work early or come in late to make sure that I could get Frank to the hospital for treatments or for his doctor's

appointments. I tried to work around his schedule. The last month, we had to put him in a nursing home. He couldn't even stand. He was very ill, and I couldn't take care of him at that point. The nursing home was terrible. They were always asking me for more money. The last week of Frank's life, they wanted to send him home. But even the nurse said to me, I don't know why they're sending him home, he's going to die any day now. He was on liquids, and he kept losing weight. They had to put stents in him. I got an appeal for him to stay and then a second appeal. But that night, he passed away. He was in a lot of pain the whole time he was there. It was a horrible death, and a painful, slow way to die.

11. I have to say, Frank died in a terrible and unnecessary way. His life was cut short. We lost a lot of money when he died. His Social Security was gone and half his pension was gone. I couldn't keep up with the maintenance of the house or our mortgage, so I had to sell our house. I had to figure out what to do with my life, and my son had to move out. Everything about the situation just messed up our lives. I have a lot of anger about what happened. I think the terrorist attacks were very unnecessary and hostile and that it affected a lot of people's lives. No one should get away with this. There should be some measure of justice.

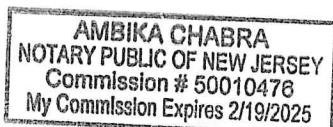


SHARI G. BRINDISI

Sworn to before me this
13th day of April, 2022



Notary Public



Thomas F. Brindisi

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
: SS.:
COUNTY OF BERGEN)

THOMAS F. BRINDISI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 240 Chubb Avenue Apt 204, Lyndhurst, NJ 07071.
2. My current age is 33, having been born on February 17, 1989.
3. I am the son of Frank M. Brindisi, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from esophageal cancer on 1/13/2018. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.
5. Before 9/11, I had a normal childhood. My dad and I loved baseball, and we would play together even though I had asthma as a kid. He taught me how to play basketball too. He showed me how do to things mechanically and showed me the music that he liked. He was a good father.

**AFFIDAVIT OF
THOMAS F. BRINDISI**

6. I was in seventh grade on September 11, 2001. I was in school, and I overheard some teachers saying that planes flew into the Twin Towers. The way they had said it, it didn't seem like a big deal to me. After we got out of class and went to lunch, I saw the Twin Towers collapsing on TV. The news channels were showing a constant loop of the planes hitting the World Trade Center. I went from thinking it wasn't a big deal to thinking, "Where is my father?" I remember going home and asking my mom if dad was okay. She didn't know, and she couldn't get in contact with him until later that night. When he came home, he was covered in the dust from when everything shot out of the buildings. He was rattled. Later, he told me about his experience. He was in the lobby, standing right near the elevator. The elevator doors opened, and a huge fireball shot out at him. The lobby filled with thick black smoke. He knew he needed to get out of there.

7. My father's story is a story of two illnesses. After he came home on 9/11, he wasn't the same person. The only interactions I had with him for the rest of his life weren't really good. My dad developed PTSD. He became verbally abusive and physically abusive. He would snap at me, telling me that I was worthless or even hitting me in the face. I remember him going to the psychiatrist, coming home with anti-depressants and not taking them. Part of what I remember when I was a kid was a real parent, and a good parent. 9/11 turned him into an abusive and negligent father. When I grew older, I hated him. I hated the holidays, my birthdays, everything.

8. When my father was diagnosed with Stage IV esophageal cancer in 2017, it took an emotional toll on me. I couldn't put the two people "together"—the father who was abusive to me as a teen but who was a good father to me before 9/11. It was hard for me to reconcile. It's not that I didn't care that he was sick, but I put on a cold front. Sometimes, I would try to help him. But he would literally push me off of him. I remember one time, he was in the kitchen where we used to live and he fell. I caught him, and he told me to get off of him. What that did to me psychologically, it's just too much to say in one interview. I remember when he was on his death bed in hospice. I wanted to make him proud of me, but at the same time he had never shown me any consideration. He didn't care who I was or what I wanted to do with my life.

9. I think it's important for the court to know that my father's illness didn't just start when he was diagnosed with cancer. The PTSD that 9/11 created took my father away from me. The cancer, which came later, put an even more significant burden on everyone in the

household. It divided my extended family—my mom and sister don't talk to my aunts, uncles, and cousins because of it. My father was the one who had held our family together. So, after 9/11, we lost not just him but also our extended family.

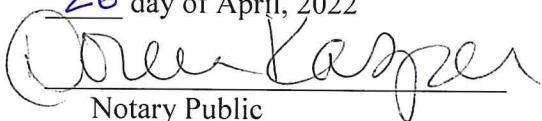
10. The way this disease progressed was unlike anything else. Cancer is one thing, but my father's cancer was something totally different. When he was diagnosed with esophageal cancer, he still looked and sounded normal. But within the course of a year, he was a shell of himself. He had a tumor on his arm the size of a baseball. It blew my mind to think that he was just a normal man, already living with Stage III or IV esophageal cancer. To be diagnosed at that stage means the cancer is already everywhere. It was just unnatural. That kind of cancer did not run in our family. It was hard to see his illness up close and personal.

11. I would like to see 9/11 victims get the compensation they deserve—whatever the court sees fit. Too many lives have been impacted by what happened that day. There needs to be some restitution.

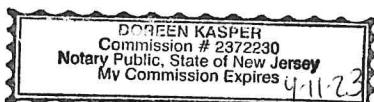


THOMAS F. BRINDISI

Sworn to before me this
26 day of April, 2022



Dooreen Kasper
Notary Public



Kathleen E. Bruzza

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF
KATHLEEN E. BRUZZA**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
: SS.:
COUNTY OF OCEAN)

KATHLEEN E. BRUZZA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 123 Bridle Path, Bayville NJ 08721.
2. My current age is 78, having been born on November 14, 1943.
3. I am the wife of James Bruzza, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from acute myeloid leukemia on June 12, 2018. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. On October 1, 2018, I was appointed personal representative of my husband's estate by the Circuit Court for Brevard County, Florida Probate Division.
6. James and I did everything together. We danced, went out on our boat, and we did everything else together. Any customers or anything that he had, we entertained. He was the

best thing that ever happened to me.

7. James worked for the New York Stock Exchange. He helped with triage efforts on 9/11/2001. There were people running away from the World Trade Center collapse, and James was pulling them off the streets and into the NYSE Building (located at 13 Wall Street). He was helping people, getting them water and medical care in the building. These people were startled and covered with dust. He tried to help as much as he could. He was that kind of person. James couldn't come home that night, but we lived in the exposure zone as well. We lived in Gateway Plaza in Battery Park City. He came home the next day and returned to the stock exchange as soon as it re-opened. He worked there continuously until 2008.

8. James immediately became depressed after 9/11. He had seen a lot. Doctors put him on Lexapro for the depression and Altace for hypertension. When he left work in 2008, he went on COBRA for insurance. After his COBRA was done, we were denied regular insurance. James was a changed person after 9/11. He had so many friends in the towers who died that day. He was always outgoing and lots of fun, but he really changed after the attacks on the World Trade Center. The depression came from losing so many people he loved.

9. Later on, he started to struggle with his health. In 2015, he was diagnosed with dermatofibrosarcoma protuberans (DFSP) cancer, and had to undergo a surgery to remove the tumors. After the surgery, he constantly felt a burning sensation in his scalp, neck, and ears. In December 2016, he began to experience atrial fibrillation. He had to undergo an ablation in order to treat it. He also had bouts of fainting. One of the times that he fainted, we took him to the emergency room. They did blood work and a bone marrow test on him and found out that he had acute myeloid leukemia (AML). That was in November 2017.

10. His life really, really changed. We retired to Florida, and James would play golf and enjoy his life. Everything changed once he got sick. Our life was going to and from hospitals, and he was always feeling ill. I would take him to Moffitt Hospital in Tampa for chemotherapy and radiation. We lived three hours away, and it was a long drive. He took a ton of medications. After the chemotherapy and radiation, he experienced a lot of side effects. He had a huge rash, diarrhea, and fatigue. Additionally, his illness caused him further depression. It was an emotionally hard time for him. He couldn't do anything that he enjoyed anymore, not even going for walks. It was horrible. James went for a stem cell transplant, and it put his body through hell. Without the transplant, he wouldn't last for more than two years. But his body

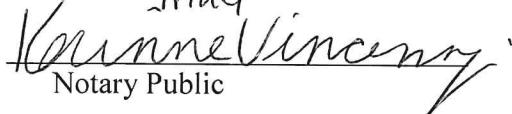
rejected the transplant. He suffered a lot.

11. My whole world fell apart. My family was all back in New Jersey and I didn't have anybody to help me. I was on my own. It was devastating. It was very hard to see someone I loved so much suffer. Everyone loved James. He was such a great guy. My family misses him so much, and I also miss him terribly.

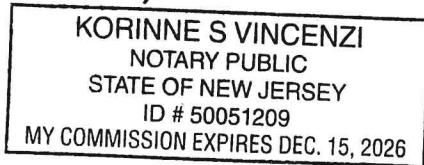


KATHLEEN BRUZZA

Sworn to before me this
19 day of April, 2022



KORINNE S. VINCENZI
Notary Public



Laurence B. Campbell

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

**AFFIDAVIT OF
LAURENCE B. CAMPBELL**

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
: SS.:
COUNTY OF UNION)

LAURENCE B. CAMPBELL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 5 Fairview Road, Clark, NJ 07066.
2. My current age is 78, having been born on December 3, 1943.
3. I am the husband of Maryann Campbell, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My wife passed away from liver and eye cancer on April 29, 2014. She was only 55 years old. It was determined that these illnesses were causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Maryann and I had a fantastic relationship. I had been married and divorced before I met Maryann. I was with Maryann for twenty-five years, and it was a great time. We traveled all over the country, went out with friends, and socialized a lot. We loved to play golf. Every year, we would go down to Georgia for Thanksgiving. It was wonderful, a great time. Even the year she died, we had planned a trip to New Hampshire. It was always good, it was

just unbelievable. She was a wonderful person. No one ever said a bad word about her. When she died, her employer had to hire grief counselors because people were so distraught. If you ever met her, within the first couple of minutes, you'd think she was a great person. She had a good life, and it ended too quickly.

6. Maryann worked for the Federal Reserve. We were actually on vacation on 9/11/2001. We were in Gettysburg, Pennsylvania playing golf. We walked into one of the gift shops, where Rudy Giuliani was on TV. We asked ourselves, "Why is Rudy Giuliani on the news?" Then, the woman at the gift shop counter said, "The bad people knocked down those buildings in New York." Maryann fell to the floor right there. We raced home. Maryann was extremely worried, as she didn't know if her friends or colleagues were safe or killed. After we returned home, Maryann couldn't get back to lower Manhattan for a week or so, as they had shut down the PATH train.

7. Maryann went back to work as soon as she could. Getting to the exposure zone was hard, because much of the public transportation had shut down. But she said, "Those terrorists are not going to take me away from my job." She was so disgusted and upset with the whole ordeal. She kept on working at the Federal Reserve until 2013. We went for a routine eye checkup on a Friday afternoon in March or April of 2013. My wife never complained about anything, but she was having a problem with her eye. The doctor inspected her and sent her to a specialist a few towns over. She was found to have a cancerous tumor in the back of her left eye. Within a week or so, she went to Sloan Kettering so they could shrink the tumor.

8. We took her to see the number one radiologist-oncologist at Sloan Kettering, because we wanted to get Maryann the best treatment. Only one in six million people ever get this kind of eye tumor. When they removed the tumor, she probably lost two thirds of her vision in her left eye. But she never complained. She was happy that she could still do most of the things she wanted to do. She could still drive and go to work. She could still hike and be physically active. She would say, "Other people have it worse." So, for the next few months, everything seemed fine.

9. In April 2014, we took Maryann for another MRI because she felt a little weird. The results showed that she had liver cancer. Sloan Kettering said they could do nothing for her, and they blew us off completely. Sloan Kettering didn't want Maryann to die in their hospital. We took Maryann to a local hospital, where they screamed at the Sloan Kettering nurses over the

phone. When she got the liver cancer diagnosis, I thought she would get some chemotherapy and be alright. But then, the doctors told us her prognosis was terminal. We both sat there and cried. We knew she was going to die.

10. The last day she was in the hospital, the nurses were giving her medication to keep her comfortable. As I left to go home I said, "I'll see you tomorrow." A friend who was visiting her called and said, "Larry, get back here." They had put Maryann in the ER. By the time I returned to the emergency room, my beautiful wife was yellow from head to toe. She looked like a wall painted yellow. The cancer specialist told me that she wasn't going to make it. They resuscitated her twice, but twice was enough. I had to sign the DNR. Within an hour, she was dead. You couldn't imagine what that did to me. I was so brokenhearted that I couldn't help her. The next morning, I arranged to bury her.

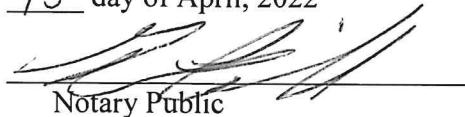
11. Maryann was a smart, wonderful person. She went to college, went to night school for her law degree, and passed the bar exam. She got a job at the Federal Reserve, where they loved her. She kept on getting promoted and promoted. Everyone wanted to work for Maryann. She was just a wonderful person. She always helped people. She took care of her sister, who was in a nursing home, and her parents. She was the President of the Auxiliary for the Clark First Aid Squad. Maryann was fourteen years younger than me, and she always said that she'd take care of me when I got old. It's wrong that she was gone. I don't know if anything could have changed, but it should have.

12. Maryann and I had a wonderful life. We had our whole future planned out. I miss her all the time. Now, I see her golf clubs and I get sad. I finally gave away her suits. The years I spent with her were great all the time. There was never a bad day. We were church-going people, good people. We figured everything would take care of itself. But when she got sick, there was nothing we could do.



LAURENCE B. CAMPBELL

Sworn to before me this
15 day of April, 2022



Notary Public



Edward J. Carroll

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
ELAINE E. MANDELKOW., et al.,

Plaintiffs,

20-CV-00315 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF PENNSYLVANIA)
: SS.:
COUNTY OF MONROE)

EDWARD J. CARROLL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 119 Steep Hill Road, Cresco, PA 18326.

2. My current age is 67, having been born on October 14, 1954.

3. I am the husband of Norma Carroll, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My wife passed away from glioblastoma on February 14, 2013. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Norma was everything to me. We did everything together. We were social people, and we spent a lot of time together. We tried to have fun whenever we could, and we did. We entertained a lot, we had a pool in the backyard, and we liked to have friends over. We went out to dinner, to the movies, and things like that. Unfortunately, I met Norma late in life. We were together for over ten years.

6. On September 11, 2001, Norma was working in downtown Manhattan as a paralegal at the law firm Sher Herman Bellone Tipopgrahe. I didn't meet Norma until 2003, so I only know what she told me about her experience on 9/11. She was paranoid about the whole thing. She saw bodies, people jumping from the towers. It really freaked her out. She had to walk over the Brooklyn bridge and was covered in white dust. She eventually returned to Manhattan for work after 9/11, but she started getting sick soon after.

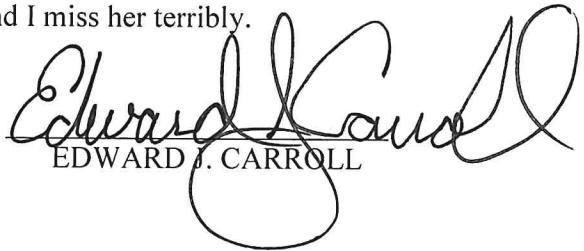
7. Norma started to visit doctors from the World Trade Center Health Program, and within about two years after 9/11, she started to show some negative health symptoms. She wasn't a complainer, but sometimes she'd tell me that she had acid reflux and trouble breathing. She was diagnosed with gastro-esophageal reflux disease (GERD) and asthma. In 2009, she accompanied me to a doctor's visit. The doctor asked her, "Do you feel alright? Something seems off." He brought her in to do some scans. That's when they came back with the brain cancer diagnosis. She had glioblastoma.

8. She underwent chemotherapy and radiation. I brought her every few weeks for her treatment. I would drive her from Pennsylvania to Brooklyn for treatment, because we wanted her to see a cancer specialist in New York. It was horrible for her. She was very claustrophobic and hated getting in the machine for the MRIs. It was a disaster. She also had two brain surgeries. They told her that they had removed the whole tumor, but obviously they didn't. They got what they could. She was constantly undergoing treatments. When Norma was first diagnosed, they told me she wouldn't last six months. But we wound up with three years.

9. It was draining to take care of Norma for those three years, but I did what I had to do. I wasn't in particularly good health either, so it made it harder. I had gotten into an accident at work and ended up having back surgery. The trips to the city for treatment were very frequent and difficult. It was a rough road, but I had to stay strong to help her out. I also paid for everything. I didn't have any issue with that—she was my wife, and I wanted to take care of her.

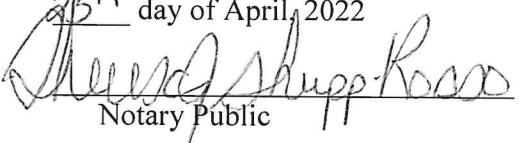
10. I'm lost without her, to be honest. I'm just going through the motions. I have more days behind me than I do ahead of me. I take depression medication. It's hard for me, I miss her a lot. Norma came from a difficult life. She was a single mother who raised two children, and she did what she had to do. When we got together, she always said that she didn't have anything to worry about anymore. We enjoyed each other's company. We kept to

ourselves, moved out to the Poconos and built a house. We made a life for ourselves. She was a good, hard working woman. I think those who were involved in the 9/11 attacks need to pay, money or otherwise. Norma's life was cut short, and I miss her terribly.



EDWARD J. CARROLL

Sworn to before me this
25th day of April, 2022



Theresa J Shupp-Rosso
Notary Public

Commonwealth of Pennsylvania - Notary Seal
Theresa J Shupp-Rosso, Notary Public
Monroe County
My commission expires March 25, 2024
Commission number 1152171